

Exhibit C

Washington, Sarah M.

From: Apter, Julie P.
Sent: Wednesday, July 31, 2019 8:47 AM
To: 'Josephine A. Greco'
Cc: Siers, Linda A.
Subject: RE: Osucha v. Alden State Bank, et al Case 1:17-cv-01026-LJV-HBS

Good morning Josephine.

I am available for the call today at 9:30. However, I reviewed this email you sent after we set the time. We have no further documents to produce and our position has also not changed. We maintain that we are ready to proceed with depositions in order to get this matter moving. Therefore, if you feel a call will be fruitful, that is fine. Just let me know your thoughts.
Julie

Julie P. Apter, Esq. | Partner

DIRECT 716.566.5458 | Ext. 5458 | **MOBILE** 716.510.2769
665 Main Street | Buffalo, NY 14203-1425

From: Josephine A. Greco
Sent: Monday, July 29, 2019 4:38 PM
To: Apter, Julie P.
Subject: Osucha v. Alden State Bank, et al Case 1:17-cv-01026-LJV-HBS

Good afternoon Julie,

In accordance with the direction of Magistrate Judge Scott, we would like to give you the opportunity to discuss with us any questions you may have regarding Plaintiff's Motion to Compel.

As you know, Plaintiff's good faith letter and Motion to Compel, included the legal basis with case law in support of our position. We have reviewed Defendants' responding papers and find no basis to change our position.

Are there additional documents you will be producing on behalf of Defendants?

We look forward to hearing from you in this regard.

Regards,

Josephine



Josephine A. Greco, Esq.

Greco Trapp, PLLC

1700 Rand Building

14 Lafayette Square

Buffalo, New York 14203

Tel: (716) 856-5800

Fax: (716) 856-5801

Email: jgreco@grecolawyers.com

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